

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

FORTRES GRAND CORPORATION, an Indiana Corporation,)	
)	
Plaintiff,)	
)	Civil Action No. 3:12 CV 535
v.)	
)	Judge Philip P. Simon
WARNER BROS. ENTERTAINMENT INC., a Delaware corporation,)	
)	
Defendant.)	

**AGREED MOTION FOR EXTENSION OF TIME
TO REPLY TO RESPONSE TO MOTION TO DISMISS**

Pursuant to Local Rules 6-1 and 7-1(d)(3), Defendant Warner Bros. Entertainment Inc. (“Warner”), by its attorneys, respectfully moves for an extension of time to file its Reply to Plaintiff Fortres Grand Corporation’s (“Fortres”) Response to Warner’s Motion to Dismiss. Fortres has agreed to extend the reply deadline through February 28, 2013. In support of this motion, Warner states as follows:

1. Fortres filed its complaint on September 19, 2012.
2. Fortres served the summons and complaint on Warner on September 25, 2012.
3. Warner’s responsive pleading was originally due on October 16, 2012.
4. Pursuant to Local Rule 6-1(b), on October 22, 2012, Warner Bros. filed a notice extending the time to respond to Fortres Grand’s complaint through November 13, 2012 and then, pursuant to Local Rule 6-1(a), moved for and was granted two further extensions of time through December 10, 2012.
5. On December 10, 2012, Warner Bros. responded to Fortres Grand’s complaint by filing a Motion to Dismiss.

6. On December 27, 2012, pursuant to a joint motion, the Court extended the time for Fortres to respond to the Motion to Dismiss through January 28, 2013, and for Warner to reply through February 14, 2013.

7. Because of the complexity of the issues raised in the Motion and Response, on February 8, 2013, Fortres consented to Warner's request to extend the deadline for filing its Reply through February 28, 2013.

8. This extension is sought for good cause and not for purposes of delay.

WHEREFORE, Warner hereby moves the Court for an order extending the time to file its Reply to Fortres' Response to Warner's Motion to Dismiss through February 28, 2013.

Respectfully submitted,

WARNER BROS. ENTERTAINMENT INC.,
a Delaware corporation

By /s/ Keith V. Porapaiboon
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Dated: February 11, 2013

CERTIFICATE OF SERVICE

I, Keith V. Porapaiboon, an attorney, hereby certify that I caused the foregoing document to be served upon the counsel of record, including the counsel listed below by utilizing the CM/ECF filing system on February 11, 2013.

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